

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

KEVIN FORSYTHE,

Plaintiff,

vs.

HARTFORD CASUALTY INSURANCE
COMPANY,

Defendants.

No. 3:20-cv-05869-BJR

STIPULATED MOTION AND ORDER TO
STAY

I. STIPULATION

The parties, by and through their respective attorneys of record, hereby move by stipulated motion for an Order to stay of this lawsuit for 90 days, until February 8, 2021. The parties are requesting this stay so the parties can continue to explore resolution of the matter on an agreed basis while avoiding significant litigation costs. The parties have had preliminary, but productive, discussions to attempt to resolve their disputes and intend to continue those discussions and potentially engage an independent mediator to assist them.

The parties respectfully submit that good cause exists for the parties' requested stay as a stay will allow the parties to continue to explore the possibility of resolving this matter without further litigation.

1 If the case is resolved, the parties will file the appropriate paperwork with the Court. If the
2 case is not resolved, the stay would expire on February 8, 2021, and the parties will request
3 issuance of a revised Order Regarding Initial Disclosures, and Joint Status Report.

4 WHEREFORE, the parties respectfully request that the Court grant the Stipulated Motion
5 for good cause shown and enter the proposed Order filed herewith.

6 **II. ORDER**

7 BASED UPON the above and foregoing stipulation, IT IS SO ORDERED.

8 DATED this 11th day of November, 2020.

9 

10 HONORABLE BARBARA J. ROTHSTEIN
11 United States District Court Judge

12 **FORSBERG & UMLAUF, P.S.**

13 By: s/ Matthew S. Adams

14 Matthew S. Adams, WSBA # 18820

15 Email: madams@foum.law

16 **Law Offices of Stephen M. Hansen, P.S.**

17 By: s/ Stephen M. Hansen

18 Stephen M. Hansen, WSBA # 15642

19 Email: steve@stephenmhansenlaw.com

20 **Nealey Law**

21 By: s/ Scott P. Nealey

22 Scott P. Nealey

23 Email: snealey@nealeylaw.com